

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Girard Street Investment Holdings LLC

Plaintiff	Case Number
vs.	24-cv-4448
PDV Holding, Inc.	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Girard Street Investment Holdings LLC

Plaintiff	Case Number
vs.	1:23-cv-10772-JSR
Petroleos de Venezuela, S.A. et al.	
Defendant	

Status of Earlier Filed Case:



Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)



Open

(If so, set forth procedural status and summarize any court rulings.)

Default Judgment entered on March 8, 2024 against Petroleos de Venezuela, S.A. and PDVSA Petroleo S.A.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Through the newly filed case, Girard Street Investment Holdings LLC--the same plaintiff as in the earlier filed case--seeks to enforce the Default Judgment entered in the earlier filed case against PDV Holding, Inc., the alter ego of judgment debtor Petroleos de Venezuela, S.A. ("PDVSA"). This case involves common issues of law and fact pertaining to enforcement of the Default Judgment. If the actions are not deemed related, there is a risk of conflicting orders regarding the enforceability of the Default Judgment. It would also avoid a duplication of effort, and expense, delay, or undue burden on the Court, the parties, and witnesses.

Signature: /s/ Evan Glassman Date: June 10, 2024

Steptoe LLP

Firm: _____